

KML LAW GROUP, P.C.
A Professional Corporation incorporated in Pennsylvania
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
Attorneys for MidFirst Bank

IN THE MATTER OF:

Nicholas J Hitchner
Randy R Hitchner aka Randy R Snyder

DEBTOR(S),

TO:

Nicholas J Hitchner
9 Meadow Wood Dr
Bridgeton, NJ 08302
Randy R Hitchner aka Randy R Snyder
9 Meadow Wood Dr
Bridgeton, NJ 08302

TERRY TUCKER
Terry Glen Tucker, P.C.
80 West Broad Street
Bridgeton, NJ 08302

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-23836 ABA

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

Isabel C. Balboa Esq.
Chapter 13 Standing Trustee
Cherry Tree Corporate Center - 535 Route 38 - Suite
580
Cherry Hill, NJ 08002

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **MidFirst Bank**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **9 Meadow Wood Drive, Bridgeton NJ 08302**. The hearing on this matter is scheduled for **July 11, 2023 at 10:00 AM**.

Dated: June 02, 2023

/s/Denise Carlon
Denise Carlon, Esquire
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